



CONFEDERATED TRIBES
of the
Umatilla Indian
Reservation

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DEPARTMENT OF SCIENCE AND ENGINEERING

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June 30th, 2005

Mr. John Price
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RECEIVED
APR 27 2006

EDMC

Subject: CTUIR Comments regarding the CERCLA Proposed Plan for the U Plant Area Soil Waste Sites in the 200-UW-1 Operable Unit

Dear Mr. Price,

Please find attached comments from the Confederated Tribes of the Umatilla Indian Reservation (CTUIR), Department of Science and Engineering (DOSE) regarding the CERCLA Proposed Plan for the U Plant Area soil waste sites in the 200-UW-1 operable unit.

The Proposed Plan is for cleanup alternatives for 31 waste sites in the 200 Area U Plant that have been contaminated from past U Plant-related operations. This includes the U Plant Canyon Building, ancillary facilities, soil waste sites, and underground pipelines. There is much concern since high-activity waste streams were sent to large, underground tanks, and low-activity liquid wastes were discharged directly to trenches, cribs, drains, and ponds in this area. These pose a direct and lingering threat to the ground water and to Tribal resources. This is in addition to any spills and leaks that may have occurred during and after the operations of this facility. Some of the contaminants at these sites include cesium-137, technetium-99, uranium, and nitrates.

The Proposed Plan indicates that more investigation and sampling will be done AFTER the cleanup alternative is selected to confirm the data matches the cleanup description. This plan for analysis is backwards. Data is needed to make the decision as to which cleanup alternative is chosen. If there is not a sufficient amount of data available to characterize a site and make a cleanup decision, then there needs to be a further investigation into the site. A cleanup site should not be "plugged-in" to different cleanup alternatives without input from the Tribes, regulators, and the public. Doing so may cost more in the long-term by having to switch between alternatives once a cleanup process has been started. Additionally, due to the complexity of each waste site, there should not be a "plug-in" approach to cleaning up the Hanford site.

The CTUIR has always advocated the "Remove, Treat, and Dispose" as the preferred alternative to cleaning up the entire Hanford site. This offers the best approach to cleaning up each contaminated site. It is the most economical in the long-term, and it is the safest approach in preventing future environmental damage. Soil covers, institutional controls, engineered barriers, etc., have a history of failure. Additionally, there has not been adequate characterization of contaminants in the vadose zone to preclude that this source may not migrate to the ground water in the future. Engineered barriers have a limited lifespan compared to the length of time the radioactive waste remains intrinsically hazardous. Surface barriers do not prevent lateral migration of water into and out of the vadose zone which may eventually contaminate the ground water zones under the barriers. In addition, the barriers have limited effectiveness if they become breached. They could also focus surface runoff into the contaminated zones if they diverge from their original designs. Surface vegetation could become altered (via fire or other sources), then an evaporative barrier would not function to the degree it was designed.

Attached are further comments that the CTUIR submitted in February 2005, during the Focused Feasibility Study for the Canyon Disposition Initiative (CDI) (221-U Facility).

If you have any other questions about our comments, please feel free to contact me at the above number.

Sincerely,

Stuart Harris,
Director, Department of Science and Engineering

Cc: Mr. Roy J. Schepens, DOE-ORP
Mr. Nicholar Ceta, USEPA Region 10
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